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January 26, 2023

The Hon. Jesse M. Furman
U.S. District Court Judge
Southern District of New York
VIA ECF

Re: United States v. Barnes, 21-cr-523 (JMF)

Dear Judge Furman,

As you know, I represent Mr. Gerald Barnes in the above-captioned matter. Your Honor recently sentenced him, on January 4, to supervised release with six months of home detention, among other conditions. I write now to request that he be permitted to travel to his home country of Ghana for his mother's memorial service, which is scheduled for this weekend (January 28).

Your Honor may recall that I informed the Court at Mr. Barnes' sentencing hearing that his mother had recently passed away in Ghana and that we would likely make this request for him to attend the family's memorial service once we had discussed it with his supervising officer. However, three weeks have elapsed since the sentencing hearing and Mr. Barnes still has not been assigned a supervising officer. Following the sentencing hearing, we immediately contacted his pretrial supervising officer, who informed us that his supervision was being transferred to a different district, and that he would have to confer and discuss this travel request with the new supervising officer. We have reached out to that office on multiple occasions and as of today, we still have no information as to who has been assigned to supervise him; we have simply been told that the new officer will be assigned "soon" and will be reaching out to Mr. Barnes "soon".

So, unfortunately, I make this request at the eleventh hour without the benefit of having spoken with his supervising officer for supervised release. Should the Court grant this request on January 26, Mr. Barnes could potentially still fly to Ghana to be there for the memorial service. He would ideally stay two weeks to grieve with his family and then return to his job and his children here in the United States but would be immensely grateful for any opportunity to be present on January 28.

I have attached a copy of the invitation for Mr. Barnes' mother's funeral services. We attempted to get a copy of the death certificate from the relevant government office in Ghana, but it was not yet available.



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Respectfully submitted,

 /s/
Matthew Galluzzo, Esq.

CC:

AUSA Kevin Mead
AUSA Jane Chong
VIA ECF

Enc.

Although this application should have been made earlier, it is GRANTED. Mr. Barnes shall (1) provide this endorsed letter and a detailed itinerary to his Pretrial Services Officer and to the Probation Office that will be supervising him; and (2) return to the United States no later than February 12, 2023.

The Clerk of Court is directed to terminate Docket No. 131.

SO ORDERED.



January 26, 2023